

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**In The Matter Of:**

<b>AN INVESTIGATION INTO WARREN COUNTY</b>	)	
<b>WATER DISTRICT'S RATE SCHEDULE FOR</b>	)	<b>CASE NO.</b>
<b>SERVICES WITH PRIVATE FIRE PROTECTION</b>	)	<b>2002-00042</b>
<b>FACILITIES</b>	)	

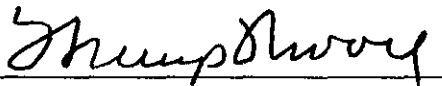
**RESPONSE TO DATA REQUEST ON**  
**BEHALF OF WARREN COUNTY WATER SYSTEM, INC.**

Warren County Water System, Inc., by counsel, pursuant to 807 KAR 5:001, for its response to the data request submitted by the Commission staff dated October 29, 2003, states as follows:

1. Attached herein are responses to the seven (7) requests for data.
2. Mr. Alan H. Vilines, P.E., Engineering Manager, on behalf of the Warren County Water System will be responsible for responding to questions concerning these responses.

DATED this 14<sup>th</sup> day of November, 2003.

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P. O. Box 10240  
Bowling Green, KY 42102-7240  
(270)782-6666

BY:   
John David Cole  
Frank Hampton Moore, Jr.

### CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was on the 14 day of November, 2003, mailed through the U.S. Mail, first class, postage prepaid, to the following:

Original and  
Eight copies to: Thomas M. Dorman  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P. O. Box 615  
Frankfort, KY 40602

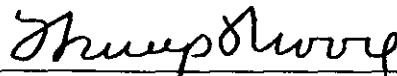
Copies to: Joe Liles  
General Manager  
Warren County Water District  
523 U.S. Highway 31-W By Pass  
P. O. Box 10180  
Bowling Green, KY 42102-4780

Hon. Dixie R. Satterfield  
Satterfield Law Office  
313 East Tenth Avenue  
P. O. Box 9970  
Bowling Green, KY 42102-9970

Hon. David Edward Spenard  
Assistant Attorney General  
Office of the Attorney General  
Utility & Rate Intervention Division  
1024 Capital Center Drive  
Suite 200  
Frankfort, KY 40601-8204

Ken Meredith  
Greenwood Skating Center  
506 Three Springs Road  
Bowling Green, KY 42104

Carryn Lee  
400 Parsons Lane  
Harrodsburg, KY 40330



John David Cole  
Frank Hampton Moore, Jr.

**WARREN COUNTY WATER SYSTEM, INC.**

1. Provide fire hydrant test results representative of all portions of your distribution system. Data should include fire flow from the hydrant at 20 psi residual pressure. The location of each hydrant for which data is provided should be located on a system map.

Answer: Data and map are enclosed as Attachment A.

2. Provide the average or median duration for which water is used in fighting structure fires located within your service territory.

Answer: Because of a lack of reporting during the test period by the Bowling Green Fire Department and the 9 different County Volunteer Fire Departments within the District's service area, we are unable to provide this information. However, where the water system is capable of providing fire flow the potential duration is at least 2 hours as required by 807KAR 5:066, Section 10(2)(b). Many areas of the system are capable of supporting fire flows for much longer periods.

3. Is your water system able to provide 4000 gallons per minute for four hours in all areas of the system while maintaining 20 psi residual pressure? If so, how many hydrants would have to be utilized to achieve said flow?

Answer: Within the system there are areas capable of providing 4,000 gpm for 4 hours with 20 psi residual pressure. The number of hydrants required to achieve 4,000 gpm would depend on the nozzle size used and the residual pressure at each hydrant.

4. Provide documentation of the Insurance Services Office's requirements for fire flow that would be applicable to each District's customers.

Answer: The District does not have current documentation for Insurance Services Office's requirements for fire flow that would be applicable to each of the District's customers. It is our understanding that the Insurance Services Office (ISO) rates fire department areas and specific properties based on fire flows and other factors, with the minimum fire flow being 250 gpm and the maximum being 12,000 gpm.

5. Provide any supporting documents to show good cause for requiring private fire protection systems to be metered as stated in 807 KAR 5:095, Section 8.

Answer: The PSC's Order dated December 7, 2001 in Administrative Case No. 385 provides guidance. Footnote 33 at the bottom of page 17 is quoted below:

"<sup>1</sup> We recognize that differences between fire protection services exist. For example, the potential for unauthorized use or theft is much less where water service is being provided only for an automatic fire sprinkler system in a residence or small commercial establishment as opposed to an industrial complex or large commercial center. In the latter, the fire protection system may consist of several hydrants, standpipes and pumps. Requiring metered fire protection service to that type of system is generally reasonable."

6. Do you meter public fire protection?

Answer: No.

7. Provide supporting documentation showing that private fire protection systems place more demand on your system than those of public fire protection.

Answer: Attachments B and C are ordinances of the City of Bowling Green and Warren County that specify public fire protection standards (600 gpm in the City and 250 gpm in the County). Attachments D and E are recent correspondence from industries requesting certain flows for private fire protection. Attachment F is a document from the Kentucky Economic Development Cabinet setting forth requirements for a site being considered for a new industry. The rates of flow for private fire protection requested in Attachments D, E and F (2,350 gpm, 2,510 gpm, and 2,500 gpm) far exceed the City's and County's requirements for public fire protection. Many other examples of similar private fire protection requirements could be provided.

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